

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

UNITED STATES OF AMERICA :

- v - :

NOTICE OF MOTION

JULIAN HEICKLEN, :

10 CR 1154 (KMW)

Defendant. :

- - - - - x

PLEASE TAKE NOTICE, that upon the annexed declaration of **Sabrina P. Shroff, Esq.**, and the accompanying Memorandum of Law, the undersigned will move this Court, before the Honorable Kimba M. Wood, United States District Judge for the Southern District of New York, 500 Pearl Street, New York, New York, at a time to be designated by the Court, for an order, pursuant to Rules 7, 8, 12, and 23 of the Federal Rules of Criminal Procedure and the First and Fifth Amendments to the United States Constitution: (1) dismissing the Indictment; (2) directing the government to file a bill of particulars; (3) granting a jury trial, and; (4) granting such other and further relief as the Court deems just and proper.

Dated: New York, New York
August 24, 2011

Respectfully submitted,
Federal Defenders of New York, Inc.

By: _____/s/
SABRINA P. SHROFF, ESQ.
STEVEN M. STATSINGER, ESQ.
Stand-by Counsel for Defendant Pro Se
JULIAN HEICKLEN
52 Duane Street - 10th Floor
New York, New York 10007
Tel.: (212) 417-873

TO:

PREET BHARARA, ESQ.

United States Attorney
Southern District of New York
300 Quarropas Street
White Plains, New York 10601
Attn: Rebecca Mermelstein, Esq.
Assistant United States Attorney